

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SEAPPOINT SHIPPING LTD	:	
	:	
Plaintiff,	:	
	:	
- against -	:	20 Civ. 6908 (JMF)
	:	
OCEANCONNECT MARINE	:	
MINERVA BUNKERING (USA) LLC	:	
	:	
Defendants.	:	
	:	

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**NOTICE OF MOTION TO STAY CLAIMS AGAINST MINERVA**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Declarations of Alexandre Soeur and Christopher Roberts, defendant Minerva Bunkering (USA) LLC (“Minerva”) will move this Honorable Court pursuant to 9 U.S.C. § 3 for an Order staying the claims asserted against Minerva by plaintiff Seapoint Shipping Ltd. in the Amended Complaint filed with the Court on October 23, 2020 (ECF No. 23), until arbitration of said claims has been had in accordance with the terms of the arbitration agreement contained in the Minerva Bunkering Terms 2019, as incorporated into the Sales Order Confirmation dated December 21, 2019 and otherwise. Minerva’s motion to stay shall be made before the Honorable Jesse M. Furman, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1105, New York, New York 10007.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order dated October 5, 2020 (ECF No. 22), any opposition to this motion shall be filed within 14 days of service of this motion.

Dated: New York, New York  
November 13, 2020

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By: s/ Keith W. Heard  
Keith W. Heard

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